High Impact Issues (Liquid)

We are working to reduce the risks to pipeline integrity which threaten public safety and the environment. We have revised our inspection process to help us address areas we have determined to impact pipeline integrity. A review of nationwide accident reports and comprehensive investigations identified several critical pipeline safety issues. These issues appear to either cause or significantly contribute to pipeline accidents. As part of our inspection process, we are determining how pipeline companies are addressing these issues and are taking note of the best industry practices we observe.

We are looking at the pipeline company as a whole rather than individual segments of pipe or pipeline facility and are discovering that a system-wide approach is far more effective and, in most cases, more efficient means of evaluating pipeline integrity. Some of the issues we will discuss with you may be better addressed by your headquarter or corporate office. Other issues can be answered at field locations. Please advise us if you prefer to defer the question to another company representative.

This is an opportunity for us to learn how your company works to prevent pipeline accidents. Please advise us if we discuss or obtain copies of any proprietary information. It is important that we identify this information because of Freedom of Information Action requirements.

Finally, our review will include an inspection for compliance with certain pipeline safety regulations. To evaluate these issues, we will need to review your procedures, records and pipeline facilities. Please let us know if the records or procedures we request are kept at another location.

Thank you for your cooperation.

NA: Not Applicable
NC: Not Checked
"Satisfactory" should be marked if no probable violation is identified. If an issue is identified which meets the minimum safety regulations and yet can be improved, please mark "Satisfactory" and discuss, in the comment section, where positive changes can be made.

Best Practice: This is our opportunity to share "best practices" with the inspected company. Comments may reflect industry standards or best practices and are not a negative reflection on the operator. All items which reference a "Best Practice" should only contain "Comments" because there are no regulations for this issue. Comments regarding an operator's program to incorporate these practices should be noted in the comment section.

"Needs Improvement" should be marked only if a probable violation is identified. Because "Needs Improvement" may include a serious compliance problem or a minor non-compliance, it is important the probable violation is thoroughly described in the comment section.

Person(s) Interviewed - Person interviewed should be documented on the front of the inspection form.

The "guidance" material was developed to assist the inspector with the engineering analysis/evaluation of pipeline operation, maintenance, and emergency functions.

Name of Operator:	
HQ Address:	**System/Unit Name Address:**
Co. Official (Pres or VP) **Telephone number:** **Fax number:** **Emergency Telephone:**	**Telephone number:** **Fax number:** **Emergency Telephone:**

Operator ID:	**Unit ID:**	**Activity ID**:

Unit IDs of adjacent Operator units:

Persons Interviewed	Titles	Phone Numbers

OPS Representative(s):

Company system maps - (copies for regional files, yes / no):

System/Unit Description:

Portion of Unit Inspected:

Was a Team O&M inspection completed previously?	**If yes, document date?** / /

Note: If a Team O&M inspection was completed within the five (5) years, it is not necessary to review the entire O&M manual. However, modifications to the manual should be reviewed.

MOP/Overpressure Protection

Overpressure protection is essential to protect the pipeline from unexpected events. The operator should have procedures in place to ensure that the overpressure protective devices are adequate and in good working condition.

195.406(a)(1) Maximum Operating Pressure - Determining the MOP from design or test pressure or integrity calculations.

195.404(a)(3) Maps and Records - Each operator shall maintain current records of the maximum operating pressure of each pipeline system.

G-Q1) Does the operator have records to support the MOP applied to each line segment?

R1) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q1) Headquarters				
Q1) Field				
R1) Headquarters				
R1) Field				

1) Comments:

195.404(b)(1) Record of Discharge Pressure - Actual operating pressures representing three years of data.

G-Q2) Does the operator's pressure recording system retain sufficient details of pressure events, so as to exhibit pressure spikes that may have breached the MOP?

R2) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q2) Headquarters				
Q2) Field				
R2) Headquarters				
R2) Field				

2) Comments:

195.428(a) Overpressure Safety Devices - Each operator shall at intervals not exceeding 15 months, but at least each calendar year, or in case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7 ½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good working condition, and is adequate from the stand point of capacity and reliability of operation for the service in which it is used.

G-Q3) Have pressure safety devices been checked for pressure accuracy in one year intervals, or six month intervals for highly volatile liquids?

R3) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q3) Headquarters				
Q3) Field				
R3) Headquarters				
R3) Field				

3) Comments:

195.128 Station Piping - Must meet applicable requirements if subjected to system line pressure.

G-Q4) Have the appropriate pressure controlling devices been installed to protect the lower-pressure piping in the manifold and/or at pump stations?

R4) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q4) Headquarters				
Q4) Field				
R4) Headquarters				
R4) Field				

4) Comments:

195.402(d)(1) Abnormal Operation - Responding to, investigating and correcting the cause of unintended closure of valves or shutdowns; and an increase or decrease in pressure or flow rate outside normal operating limits.

195.404(b)(2) Maps and Records - Each operator shall maintain for at least 3 years daily operating records of any emergency or abnormal operation.

G-Q5) Did the safety devices function properly during abnormal operation?

R5) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q5) Headquarters				
Q5) Field				
R5) Headquarters				
R5) Field				

5) Comments:

195.402 (d)(2) Procedures for checking variations after abnormal operations - Checking for safe operation at sufficient critical locations to determine continued integrity and safe operation.

195.404(b)(2) Maps and Records - Each operator shall maintain for at least 3 years daily operating records of any emergency or abnormal operation.

G-Q6) Are procedures and forms used to document the occurrence of unscheduled shutdowns and over-pressure situations?

R6) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q6) Headquarters				
Q6) Field				
R6) Headquarters				
R6) Field				

6) Comments:

195.402(d)(5) Procedural manual for operations, maintenance, and emergencies - Abnormal Operation - Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

G-Q7) Does the procedure direct the analysis of abnormal conditions to prevent future abnormal events?

R7) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q7) Headquarters				
Q7) Field				
R7) Headquarters				
R7) Field				

7) Comments:

195.302(c) - Compliance deadlines for pipelines that have not been pressure tested.

G-Q8) Has the operator developed a plan for testing its pipeline systems?

R8) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q8) Headquarters				
Q8) Field				
R8) Headquarters				
R8) Field				

8) Comments:

195.426 Scraper and Sphere Facilities - Pressure indication and relief devices.

G-Q9) Do traps have functioning visual or audible indications of pressure to alert operating and maintenance personnel about elevated trap pressure?

R9) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q9) Headquarters				
Q9) Field				
R9) Headquarters				
R9) Field				

9) Comments:

Inspection Criteria relating to SCADA and other Alarm Systems

195.262(a) Pump Station Ventilation and Warning Devices - Detecting hazardous vapors.

G-Q10) Has the operator installed warning devices in pump station buildings to warn of the presence of hazardous vapors?

R10) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q10) Headquarters				
Q10) Field				
R10) Headquarters				
R10) Field				

10) Comments:

195.402(c)(9) Facilities not equipped to fail safe - As described in 195.402(c)(4), facilities that are located in areas that control the receipt and delivery of hazardous liquids would require an immediate response by the operator to prevent hazards to the public must be monitored... usually by SCADA if unattended.

G-Q11) Are all the unattended locations on the operator's system which control the receipt and delivery of hazardous liquids monitored?

R11) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q1) Headquarters				
Q11) Field				
R11) Headquarters				
R11) Field				

11) Comments:

195.408(a) Communications System for Pipeline Information - Each operator must have a communication system to provide for the transmission of information needed for the safe operation of its pipeline.

G-Q12) Will system operation be affected by communication outages or SCADA failure?

R12) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q12) Headquarters				
Q12) Field				
R12) Headquarters				
R12) Field				

12) Comments:

G-Q13) Best Practice:
Does the operator have a means to prevent controller fatigue?

13) Comments:

195.134 Definition and application of the computational pipeline monitoring (CPM) leak detection system.

G-Q14) Does the operator have a leak detection system?

R14) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q14) Headquarters				
Q14) Field				
R14) Headquarters				
R14) Field				

14) Comments:

195.404(c)(3) Maps and Records - Each operator shall maintain a records for two years.

G-Q15) Does the operator maintain records per the requirements of 195.404(c)(3)?

R15) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q15) Headquarters				
Q15) Field				
R15) Headquarters				
R15) Field				

15) Comments:

Engineering Drawing Review

195.402(c)(1) Maintenance and Normal Operation - Making construction records, maps, and operating history available for safe operation and maintenance.

G-Q16) How does the operator control engineering drawing revision, review, approval, and distribution?

R16) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q16) Headquarters				
Q16) Field				
R16) Headquarters				
R16) Field				

16) Comments:

195.404(a) Each operator shall maintain current maps and records of its pipeline systems.

Q17) Do the operator's "as-built" agree with field? Do the SCADA terminals get updates?

R17) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q17) Headquarters				
Q17) Field				
R17) Headquarters				
R17) Field				

17) Comments:

195.402(c)(1) Maintenance and Normal Operation - Making construction records, maps, and operating history available for safe operation and maintenance.

Q18) How are completed construction activities, such as facility modifications, communicated to the controller?

R18) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q18) Headquarters				
Q18) Field				
R18) Headquarters				
R18) Field				

18) Comments:

Process Control and Flow Schematic Drawing Review

Differences between process control engineering drawings and pipeline facilities have resulted in incidents and abnormal operating conditions. We have found that physical changes made to facilities are sometimes not reflected in engineering drawing or SCADA displays. The company should have a procedure in place that ensures changes in the field are communicated to appropriate personnel and correspondence (i.e. maps, records and drawings) are corrected.

195.404(a) Each operator shall maintain current maps and records of its pipeline systems.

G-Q19) Do engineering, process control, and flow schematic drawings adequately depict current facilities and operations?

R19) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q19) Headquarters				
Q19) Field				
R19) Headquarters				
R19) Field				

19) Comments:

Review of First Discovery Reports

First discovery reports are reports that may identify potential problems on, or in the vicinity of the pipeline, that could affect pipeline integrity and/or public safety. These reports could include any pipeline safety inspection and/or survey reports, landowner or general public reported concerns, patrol reports. Listed below are a few high impact examples.

195.416(e) External Corrosion Control - the operator shall examine exposed pipe for external corrosion.

195.416(i) External Corrosion Control - the operator shall clean, coat for the prevention of atmospheric corrosion

195.401(b) Operation and Maintenance - the operator shall correct any condition that could adversely affect the safe operation of its pipeline within a reasonable time.

G-Q20) Does the operator disseminate, monitor, and follow-up the information obtained from first discovery reports?

R20) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q20) Headquarters				
Q20) Field				
R20) Headquarters				
R20) Field				

20) Comments:

195.416(e) cont'd

G-Q21) Does the company follow-up and document discovered exposed spanning pipe in water and do they take fluctuating water levels into consideration?

R21) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q21) Headquarters				
Q21) Field				
R21) Headquarters				
R21) Field				

21) Comments:

195.408(a) Each operator must have a communication system to provide for the transmission of information needed for the safe operation of its pipeline system, and (b) The communication system required by paragraph (a) of this section must, as a minimum, include means for: (1) Monitoring operational data as required by §195.402(c)(9);(2) Receiving notices from operator personnel, the public, and public authorities of abnormal or emergency conditions and sending this information to appropriate personnel or government agencies for corrective action;(3) Conducting two-way vocal communication between a control center and the scene of abnormal operations and emergencies; and (4) Providing communication with fire, police, and other public officials during emergency conditions, including a natural disaster.

G-Q22) How does the operator follow-up and document public/landowner complaints concerning safety and integrity issues?

R22) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q22) Headquarters				
Q22) Field				
R22) Headquarters				
R22) Field				

22) Comments:

195.401(a) No operator may operate or maintain its pipeline systems at a level of safety lower than that required by this subpart and the procedures it is required to establish under §195.402(a) of this subpart; and (b) Whenever an operator discovers any condition that could adversely affect the safe operation of its pipeline system, it shall correct it within a reasonable time. However, if the condition is of such a nature that it presents an immediate hazard to persons or property, the operator may not operate the affected part of the system until it has corrected the unsafe condition.

195.404(b) Each operator shall maintain for at least 3 years daily operating records that indicate-

(1) The discharge pressure at each pump station; and
(2) Any emergency or abnormal operation to which the procedures under §195.402 apply.

(c) Each operator shall maintain the following records for the periods specified;

(1) The date, location, and description of each repair made to pipe shall be maintained for the useful life of the pipe.
(2) The date, location, and description of each repair made to parts of the pipeline other than pipe shall be maintained for at least 1 year.
(3) A record of each inspection and test required by this subpart shall be maintained for at least 2 years or until the next inspection or test is performed, whichever is longer.

G-Q23) How does the operator follow-up and document integrity issues system-wide?

23) Comments:

Training

Operator errors result in pipeline incidents every year. We are trying to determine what processes operators have in place to address the training requirements and safety needs of the pipeline industry.

195.403 Training

G-Q24) Has the operator established and conducted a continuing training program to instruct operating and maintenance personnel?

R24) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q24) Headquarters				
Q24) Field				
R24) Headquarters				
R24) Field				

24) Comments:

195.403 Cont'd

Q25) Does the operator review, at intervals not exceeding 15 months, but at least once each calendar year, the performance of their personnel in meeting the objectives of the training program?

R25) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q25) Headquarters				
Q25) Field				
R25) Headquarters				
R25) Field				

25) Comments:

195.509(a) Operators must have a written qualification program by April 27, 2001.

G-Q26) Has the operator developed a written qualification program?

R26) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q26) Headquarters				
Q26) Field				
R26) Headquarters				
R26) Field				

26) Comments:

Corrosion Control

Corrosion is a major cause of accidents and disbonded coating is often the leading factor. A check of close interval surveys for depressed areas may reveal disbonded coating. Pipe segments adjacent to locations where corrosion is found could easily develop corrosion because it may be subject to the same conditions. Additional preventive measures should be taken in these areas such as bell hole examinations and smart pigging activities. Review locations where clock-spring repairs were made to identify pipe segments that are subject to active corrosion.

195.414 Cathodic Protection

195.416 External Corrosion Control

195.418 Internal Corrosion Control

G-Q27) Does the company maintain a comprehensive corrosion control program?

R27) Associated Records (annual survey, rectifiers)?

	Satisfactory	Needs Improvement	N/A	N/C
Q27) Headquarters				
Q27) Field				
R27) Headquarters				
R27) Field				

27) Comments:

G-Q28) Best Practice: Industrial Standards - RP0169, NACE
Is the company's corrosion program under the direction of a qualified person? (List the qualifications in the comment field.)

28) Comments:

195.402 Procedural Manual for Operation, Maintenance, and Emergencies - the operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies.

G-Q29) Are corrosion control procedures in place and do they follow Part 195/NACE/industry standards?

R29) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q29) Headquarters				
Q29) Field				
R29) Headquarters				
R29) Field				

29) Comments:

195.402 cont'd

195.414 cont'd

195.416 cont'd

195.418 cont'd

G-Q30) How is the gathered information reviewed and analyzed to identify problem areas?

R30) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q30) Headquarters				
Q30) Field				

R30) Headquarters				
R30) Field				

30) Comments:

195.401(b) Operation and Maintenance - the operator shall correct any condition that could adversely affect the safe operation of its pipeline within a reasonable time.

G-Q31) Under what conditions does the operator take prompt remedial action?

R31) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q31) Headquarters				
Q31) Field				
R31) Headquarters				
R31) Field				

31) Comments:

Q32) Best Practice:
What factors are considered in determining the need for and timing of pigging and close interval surveys?

32) Comments:

Tanks

Inspection criteria relating to Tankage.

195.2 Definition - Breakout Tank means a tank used to (a) relieve surges in *hazardous liquid pipeline system* or (b) receive and store hazardous liquid transported by a pipeline for re-injection and continued transportation by pipeline.

G-Q33) Has the operator correctly identified/classified its tanks?

R33) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q33) Headquarters				
Q33) Field				
R33) Headquarters				
R33) Field				

33) Comments:

195.428(b) Over pressure safety devices - In case of relief valves on pressure breakout tanks containing highly volatile liquids, each operator shall test each valve at intervals not exceeding 5 years.

G-Q34) Does the operator ensure relief valves are tested?

R34) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q34) Headquarters				
Q34) Field				
R34) Headquarters				
R34) Field				

34) Comments:

195.432 Breakout tanks - Each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, inspect each breakout tank (including atmospheric and pressure tanks).

G-Q35) Has the operator conducted the appropriate inspections? Does the operator use available industry codes and standards to uniformly establish maintenance and repair inspection criteria for the breakout tanks?

R35) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q35) Headquarters				
Q35) Field				
R35) Headquarters				
R35) Field				

35) Comments:

G-36) Best Practice:
Are the breakout tanks equipped with high level alarms?

36) Comments:

Valves

It is important that isolation valves be in good working order and accessible when needed.

195.116 Valves

G-Q37) Has each valve been properly designed, marked, and tested?

R37) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q37) Headquarters				
Q37) Field				
R37) Headquarters				
R37) Field				

37) Comments:

195.260 Valve Locations - A valve must be installed at each of the following locations: on the suction and discharge end of a pump station; on each line entering or leaving a breakout tank area; along the pipeline that will minimize damage or pollution from accidental discharge; on each lateral takeoff from the trunk line; on each side of a water crossing that is more than 100 feet wide at high-water mark; and on each side of a reservoir holding water for human consumption.

G-Q38) Are mainline valves properly identified and located?

R38) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q38) Headquarters				
Q38) Field				
R38) Headquarters				
R38) Field				

38) Comments:

195.420(a) Valve Maintenance - the operator shall maintain each valve that is necessary for the safe operation of its pipeline system in good working order at all times.

G-Q39) Does the operator maintain each valve that sees mainline pressure and flow in good working order?

R39) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q39) Headquarters				
Q39) Field				
R39) Headquarters				
R39) Field				

39) Comments:

195.420(b) Valve Maintenance - the operator shall, at intervals not exceeding 7 ½ months, but at least twice each calendar year, inspect each mainline valve to determine that it is functioning properly.

G-Q40) Does the operator inspect each mainline valve on a bi-annual 7 ½ month basis to determine that their valves are functioning properly?

R40) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q40) Headquarters				
Q40) Field				
R40) Headquarters				
R40) Field				

40) Comments:

195.420(c) Valve Maintenance - the operator shall provide protection for each valve from unauthorized operation and from vandalism.

G-Q41) Does the operator protect their valves from vandalism?

R41) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q41) Headquarters				
Q41) Field				
R41) Headquarters				
R41) Field				

41) Comments:

195.404(c)(3) Maps and Records - Each operator shall maintain a record of their inspection of mainline valves for two years.

G-Q42) Does the operator maintain proper records for mainline valves?

R42) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q42) Headquarters				
Q42) Field				
R42) Headquarters				
R42) Field				

42) Comments:

G-Q43) Best Practice:
Are valves located to provide quick response for environmentally sensitive areas such as drinking water sources, national parks, etc.?

43) Comments:

G-Q44) Best Practice:
Are there any locations where special features, such as valve stem extension in flood plains, had to be incorporated because of difficulty in complying with the above? Are there any automatic or remotely controlled valves?

44) Comments:

Patrol Program

An effective patrol program will combine information throughout the company to prevent damage to the pipeline and detect damage that has already occurred. Companies are encouraged to correlate information from a variety of sources such as comparing patrolling records with internal inspection data. Communication and areas of responsibility between patrol pilots and the personnel who follow-up and track the reports should be clearly defined so that both parties understand their role in preventing outside force damage.

195.402 Procedure Manual for Operations, Maintenance and Emergencies.

G-Q45) Does the operator have an adequate patrolling program ?

R45) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q45) Headquarters				
Q45) Field				
R45) Headquarters				
R45) Field				

45) Comments:

Line Markers and Damage Prevention (Locating and Marking Pipelines)

It is critical that personnel who locate buried pipe in the course of their work are qualified and competent. Personnel performing this work may be operator or contract service company employees (line locate company, corrosion survey company, pipeline surveyors, etc.).

195.410(a) Line Markers - each operator shall place and maintain line markers over each buried pipeline.

G-Q46) Are markers located at public road crossing, railroad crossings, and in sufficient number along the remainder of each buried line?

R46) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q46) Headquarters				
Q46) Field				
R46) Headquarters				
R46) Field				

46) Comments:

195.402(c)(13) Procedural manual for operations, maintenance, and emergencies - Maintenance and normal operations - the manual must include procedures for periodically reviewing the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.

195.442(a) Damage prevention program - if the operator does not participate in a public service program, such as a one-call system, then the operator of a buried pipeline must carry out a written program to prevent damage to that pipeline from excavation activities.

G-Q47) Does the operator participate in a public service program? If not, does the operator evaluate their damage prevention procedures and take corrective action where deficiencies are found?

R47) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q47) Headquarters				
Q47) Field				
R47) Headquarters				
R47) Field				

47) Comments:

195.442(c) Damage prevention program - the operator must identify, on a current basis, persons who normally engage in excavation activities in the area in which the pipeline is located; notify the public and persons who normally engage in excavation activities of the damage prevention program; provide a means of receiving and recording notification of planned excavation activities; provide for actual notification of persons who give notice of their intent to excavate of the type of temporary marking to be provided and how to identify the markings; and provide inspection of excavation activities, if the operator believes the pipeline could be damaged by excavation activities.

195.442(c)(3) Damage prevention program - if the operator participates in a public service program, such as a qualified one-call system, then the operator must: provide a means of receiving and recording notification of planned excavation activities.

G-Q48) Does the operator have an adequate damage prevention program?

R48) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q48) Headquarters				
Q48) Field				
R48) Headquarters				
R48) Field				

48) Comments:

G-Q49) Best Practice: NPRM Qualification of Pipeline Personnel
Are trained/qualified personnel used for pipeline locating & marking?

49) Comments:

Liaison with Construction Project and Land-Use Officials (Public Education)

Encroachment around pipelines poses serious safety risks as third parties excavate in proximity to buried pipelines. A strong damage prevention program will provide advance notification of construction plans near the pipeline and will establish communication with the people involved in the project.

195.440 Public Education - each operator shall establish a continuing educational program to enable the public, appropriate government organizations, and persons engaged in excavation related activities to recognize a hazardous liquid or a carbon dioxide pipeline emergency and to report it to the operator or the fire, police, or other public officials.

G-Q50) How does the operator implement its continuing education program?

R50) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q50) Headquarters				
Q50) Field				
R50) Headquarters				
R50) Field				

50) Comments:

G-51) Best Practice:
Does the operator's damage prevention program include pro-active liaison with public construction project and land-use officials, engineers, and contractors?

51) Comments:

G-Q52) Best Practice:
Does the operator's damage prevention program include pro-active liaison with local school officials, where the pipeline traverses or is adjacent to, school property?

52) Comments:

G-Q53) Best Practice:
Does the operator have a liaison program that includes local developers and construction project officials?

53) Comments:

G-Q54) Best Practice:
Has the operator reviewed the "Common Ground" Study of One Call Systems and Damage Prevention Best Practices?

54) Comments:

G-Q55) Best Practice:
Has the operator compared and measured the best practices against existing damage prevention practices contained in the operator's damage prevention plan?

55) Comments:

G-Q56) Best Practice:
Has the operator implemented any of the best practices in addition to their existing damage prevention activities subsequent to review of the Common Ground Study?

56) Comments:

G-Q57) Best Practice:
Has the operator improved communication with other stakeholders in damage prevention as a result of the best practices?

57) Comments:

Oil Pollution Act High Impact Inspection (49 CFR 194)

Field Verification of Facility Response Plan Information		Y	N	N/A
194.111	Is there a copy of the approved Facility Response Plan present? RSPA Tracking Number _____ Approval Date_____ [See Guidance OPA-1]			
194.107	Are the names and phone numbers on the notification list in the FRP current?[OPA-2]			
194.107	Is there written proof of a contract with the primary oil spill removal organization (OSRO)? [OPA-3]			
194.107	Are there complete records of the operator's oil spill exercise program? [OPA-4]			
194.117	Does the operator maintain records for spill response training (including Hazwoper training)? [OPA-5]			

OPA Inspection Guidance

OPA-1 - RSPA Tracking Number: This is also known as the "sequence number." It is a four-digit number that OPS HQ assigns to each facility response plan (FRP). If the operator does not know their sequence number, they should look on their copy of the FRP for the sequence number. Also, OPS HQ always puts the sequence number in every plan-related letter to operators.

Copy of approved FRP: Every oil pipeline operator must have an FRP approved by OPS. The operator should be able to produce their OPS plan approval letter. When OPS HQ approves a plan, the approval is valid for five years from the date of the approval letter.

OPA-2 - Names and phone numbers: Operators are required to keep the notification lists in their FRP current. The inspector should examine the notification list in the FRP and spot-check the accuracy of the names and phone numbers when they interview the operator. It is critical to check the Qualified Individual (QI) and Alternate QI data.

OPA-3 - Proof of OSRO contract: Operators whose FRP's state that they are relying on clean-up contractors for spill response are required to have contracts with the oil spill removal organizations (OSRO's) that they cite in the FRP. The inspector should ask to see documentation that the operator has a contract in place with the primary OSRO listed in the FRP.

OPA-4 - Exercise documentation: Operators are required to conduct a variety of spill response exercises under Part 194, and make their exercise records available to OPS for inspection. Inspectors should check to see if the operator lists the date, time, location and names of exercise participants. If the inspector has doubts about whether the operator's exercise documentation is accurate, it should be noted on the inspection form so that OPS HQ can follow up with the operator. The documentation should include annual spill management team tabletop exercises, quarterly internal notification drills, and annual response equipment deployment drills? The drill does not necessarily need to include a pipeline spill scenario, but should test the operator's personnel, equipment, resources, and response strategies needed for responding to a comparable pipeline spill.

OPA-5 - Training records: Operators are required to train their personnel to carry out their individual roles under the FRP. The inspector should spot-check the files of key personnel listed in the FRP to ensure that they have been trained to carry out their duties in a response. Special attention should be given to documenting the safety training required under OSHA's Hazwoper standard (29 CFR 1910.120). Each person involved in a spill response is required under 194.117 to have training commensurate with their duties.